

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2019ML012513

Court Case No.:

VS.

CRIMINAL COMPLAINT

THOMAS, JOHNNY L. JR.
8709 W. HAMPTON AVE.
MILWAUKEE, WI 53225
[REDACTED]

Defendant(s).

For Official Use

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

Count 1: FOURTH DEGREE SEXUAL ASSAULT

The above-named defendant on or about Thursday, March 07, 2019, at 115 South 84th Street, Ste 100, in the City of Milwaukee, Milwaukee County, Wisconsin, did have sexual contact with DB, without consent, contrary to sec. 940.225(3m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 2: DISORDERLY CONDUCT

The above-named defendant on or about Tuesday, May 07, 2019, at 115 South 84th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, while in a private place, did engage in indecent conduct, under circumstances in which such conduct tended to provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b) Wis. Stats.

Upon conviction for this offense, a Class B Misdemeanor, the defendant may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

Probable Cause:

Complainant is a law enforcement officer with the City of Milwaukee Police Department and bases this complaint on reports authored by Milwaukee Police Officers Shawn Toms and Phillip Gagnon, the kind of which Complainant has relied upon in the past and found to be truthful and accurate. Based on those reports, Complainant swears to the following:

As to Count 1:

Officer Toms reports that on June 3, 2019, he spoke with DB, who stated that she was sexually assaulted by a co-worker, who she identified as Johnny Lee Thomas Jr., the above-named Defendant, on March 11, 2019 at her work place, located at 115 S. 84th St. in the City and County of Milwaukee, WI. DB stated that as she was having lunch with the Defendant, he stood up, reached across the table, and stuck his hand down the front of DB's shirt, touching her breasts without her consent. DB stated that as the Defendant did this, he moved his hand back and forth in between her breasts, and was attempting to look down her shirt as he did this. DB stated that she did not immediately inform her supervisor for fear of a fight at her workplace.

As to Count 2:

Officer Gagnon reports that on June 3, 2019, he spoke with JS, who stated that she also works with the Defendant at 115 S. 84th St. JS stated that on May 7, 2019, she was speaking with the Defendant in a hallway at work when he asked her, "did you wear that dress for me?" and then proceeded to grab the front zipper of her dress and pulled it down approximately 2 inches, exposing her chest. JS stated that as he was doing this, the Defendant's arm made contact with both of her breasts over her clothing. JS stated that this behavior made her uncomfortable and immediately informed her supervisor.

****End of Complaint****

Electronic Filing Notice:

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Taylor Kraus.

Subscribed and sworn to before me on 06/14/19

Electronically Signed By:

Taylor Kraus

Assistant District Attorney

State Bar #: 1092943

Electronically Signed By:

Det. Michael Chaperon

Complainant